

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

CASE NO: 0:22-cv-61471-WPD

ANDREA GRAJEDA, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

VERIFIED MOVING PROS, LLC, and
DONALD LINA, individually,

Defendants.

PLAINTIFFS' RENEWED¹ MOTION FOR ENTRY OF FINAL JUDGMENT

Plaintiff, ANDREA GRAJEDA, and Opt-in Plaintiffs, BRYAN ROBERT, NICHOLAS DE FREITAS, JAVIER ALEXANDER PAULINA-PENA, CHRISTINA BIANCA-FAUSTIN and AMBER ASHLEY LEE (collectively hereinafter “Plaintiffs”), by and through undersigned counsel file this Renewed Motion for Entry of Final Judgment and in support thereof state as follows:

1. On September 22, 2023, this Court entered an order granting summary judgment in favor of Plaintiffs and against Defendants, VERIFIED MOVING PROS, LLC and DONALD LINA (the “Order”) [D.E. 72].

2. The Order awarded Plaintiffs their claimed damages and liquidated damages. *Id.* at 12. The Order states that the Court will enter a Final Judgment after the conclusion of a jury

¹ This Motion has been amended to include a Certificate of Conferral as required by the Court [D.E. 77]



trial on damages for remaining Opt-in Plaintiffs, LONG TRANG, ALEXANDREA JORDAN, and DONOVAN LEONARD. *Id.*

3. Rather than continue with a jury trial, Defendants, VERFIED MOVING PROS, LLC and DONALD LINA, agreed to enter into a Consent Judgment with the remaining plaintiffs [D.E. 74]

4. On October 6, 2023, the Court entered a Consent Judgment in favor of LONG TRANG, ALEXANDREA JORDAN, and DONOVAN LEONARD and against Defendants, VERFIED MOVING PROS, LLC and DONALD LINA, joint and severally [D.E. 75].

5. As the Court will not conduct a jury trial, it should enter a Final Judgment in favor of Plaintiffs consistent with the Order [D.E. 72 at 12].

6. As stated in the Order, Plaintiffs are entitled to a Final Judgment in the following amounts:

- a. Plaintiff, ANDREA GRAJEDA, is awarded \$1,226.40 in unpaid overtime damages and \$1,226.40 in liquidated damages for a total damage amount of \$2,452.80 against VERFIED MOVING PROS, LLC and DONALD LINA, joint and severally.
- b. Opt-in Plaintiff, BRYAN ROBERT, is awarded \$1,043.60 in unpaid overtime damages and \$1,043.60 in liquidated damages for a total damage amount of \$2,087.20 against VERFIED MOVING PROS, LLC and DONALD LINA, joint and severally.
- c. Opt-in Plaintiff, NICHOLAS DE FREITAS, is awarded \$920.70 in unpaid overtime damages and \$920.70 in liquidated damages for a total damage amount of



\$1,841.40 against VERFIED MOVING PROS, LLC and DONALD LINA, joint and severally.

- d. Opt-in Plaintiff, JAVIER ALEXANDER PAULINA-PENA, is awarded \$1,584.00 in unpaid overtime damages and \$1,584.00 in liquidated damages for a total damage amount of \$3,168.00 against VERFIED MOVING PROS, LLC and DONALD LINA, joint and severally.
- e. Opt-in Plaintiff, CHRISTINA BIANCA-FAUSTIN, is awarded \$560.00 in unpaid overtime damages and \$560.00 in liquidated damages for a total damage amount of \$1,120.00 against VERFIED MOVING PROS, LLC and DONALD LINA, joint and severally.
- f. Opt-in Plaintiff, AMBER ASHLEY LEE, is awarded \$1,584.00 in unpaid overtime damages and \$1,584.00 in liquidated damages for a total damage amount of \$3,168.00 against VERFIED MOVING PROS, LLC and DONALD LINA, joint and severally.

7. Plaintiffs have attached a proposed Final Judgment to this motion as Exhibit “A”.

8. The proposed Final Judgment states that Plaintiffs are prevailing parties in this action pursuant to 29 U.S.C. § 216(b). It further states that Plaintiffs will file a motion for attorneys’ fees and reimbursable costs in accordance with Local Rule 7.3.

9. The proposed Final Judgment requests that the Court retain jurisdiction of this matter to adjudicate entitlement and amount of attorneys’ fees and costs.



WHEREFORE, Plaintiffs respectfully request that the Court enter Final Judgment in a form substantially similar to the proposed Final Judgment attached hereto as Exhibit “A” and for any such further relief the Court deems just and proper.

CERTIFICATE OF COMPLIANCE WITH S.D. FLA. L.R. 7.1(a)(3)

Pursuant to Southern District of Florida Local Rule 7.1(a)(3), prior to the filing of this Motion, the Parties conferred on October 11, 2023 and October 12, 2023 as to the relief sought within. Counsel for Defendants state that they do not oppose the relief sought in this motion.

Respectfully Submitted,

USA EMPLOYMENT LAWYERS -

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing motion was served on all parties listed below on October 12, 2023.

/s/ Michael V. Miller

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